

CHAPTER 23. TARGETING OF FOREIGN VESSELS FOR BOARDINGS

A. Background.

1. Introduction. The goal of the Port State Control Program is to identify and eliminate substandard foreign merchant ships from U.S. waters and to encourage those committed to trading with the U.S. to adopt management philosophies that ensure compliance with accepted standards. This program was mandated by Congress in the 1994 Department of Transportation Appropriations Bill, which required the Coast Guard to change its approach to foreign vessel boardings to "hold those most responsible for substandard ships accountable, including owners, classification societies and flag states." In part, the program pursues this goal by focusing boarding and examination efforts on those vessels most likely to be substandard. This targeting allows Coast Guard resources to be used more efficiently while rewarding well managed vessels with less frequent boardings. A targeting matrix is used to identify those vessels at greatest risk of being substandard based on identified risk factors. Using this matrix allows a ship's risk of being substandard to be consistently measured and allows limited Coast Guard resources to be directed towards boarding those which represent the greatest risk.
2. Targeting Philosophy.
 - a. Applicable Factors. A comprehensive but simple targeting regime has been devised to consistently focus Coast Guard boarding efforts on those vessels most likely to be substandard. This is a risk-based regime based on five factors. These factors are a ship's owner, flag state, classification society, boarding history and vessel type. The risks associated with each of these factors is determined based on Coast Guard boarding data. These determinations are used to assign points using the targeting matrix, which determines the boarding priority given to foreign vessels entering U.S. waters.
 - b. Functionality. The points assigned to a vessel under this targeting regime do not classify it as substandard; only a boarding and examination can reveal such conditions. The targeting matrix simply helps the Coast Guard assess risk so that limited resources can be focused on those vessels most likely to be substandard. Once on board, Coast Guard personnel must examine the vessel to determine whether it is in substantial compliance with accepted international conventions and U.S. requirements. If it is not, it may then be considered substandard.

- c. Consistency. To be effective, it is important that this targeting regime be applied consistently. The purpose is to place the onus for maintaining vessels to accepted standards on those most responsible including owners, classification societies and flag states. Linking boarding decisions to the performance records of the ship, the owner, classification society and flag state sends a clear message that the incidence of boardings may be reduced by improving their performance records.

(1) Adherence to the Targeting Regime.

OCMI/COTP's are expected to ensure available resources are utilized in accordance with the Targeting Regime outlined in this chapter. Annual passenger, tank and freight vessel examinations, biennial Certificate of Compliance examinations and quarterly passenger vessel reexaminations are expected to be performed at the indicated frequency in 100% of the cases. Other boardings are to be conducted to the extent practical, with resources targeted at vessels of the highest priority first.

- (2) Modifications. Modifications or additions to the targeting criteria by OCMI's/COTP's to address port specific concerns should be documented in locally prepared guidance to ensure consistent application and accountability. In those instances where Priority I vessel boardings and annual examinations cannot be accomplished due to personnel shortfalls, weather or other circumstances, records should be maintained indicating the reason vessels were not boarded.

- (3) Boardings After Dark. Because conditions may vary considerably between ports, piers, and even individual vessels, the decision to examine a vessel after dark is left to the discretion of the local OCMI/COTP. A blanket policy of not boarding vessels after dark is unacceptable. Each situation must be individually evaluated based upon existing or forecast weather, sea conditions, resource limitations, ambient lighting, and/or the availability of artificial lighting.

- (4) Boardings Delayed Due To Weather, Visibility, Logistics or Resources Limitations. The shipping industry operates 24 hours a day,

seven days a week. Consequently, the Coast Guard must be prepared to provide necessary services on the same basis. However, the OCMI/COTP must consider the safety of the boarding team as well as their ability to see and identify potential discrepancies in deciding where and when to board a ship. Existing or forecast weather, sea conditions, visibility, boarding team fatigue, logistics and conflicting resource demands may affect the decision. Within the framework of the targeting regime outlined in this chapter, the OCMI/COTP is encouraged to work with vessel owners, operators, and agents to accommodate scheduling of exams without compromising the safety of the boarding teams.

- d. Effect. When applied consistently, the targeting regime ensures that vessels which pose the very highest risk are boarded during every U.S. port call while vessels that pose the lowest risk are boarded no more than annually. Although the targeting regime will affect which vessels are boarded, where they are boarded and the frequency of boarding, it should not affect the scope of the examination performed while aboard a ship. Examinations are to be conducted in accordance with the policy discussed in Chapters 19 through 22 of this volume as appropriate.

B. Targeting Criteria. To implement the targeted boarding regime, it is necessary to identify which vessels, vessel owners, classification societies and flag states are most often associated with substandard ships. These determinations are made by G-MCO based on Coast Guard boarding and intervention data. To understand how these determinations are made, it is necessary to define certain terms of reference.

1. Targeted Owner. A targeted owner includes any owner, operator, or managing operator whose vessels have been detained in the U.S. more than once within the previous 12 months under the provisions of an international convention.

- a. Targeted Owners List. G-MCO develops and maintains a current listing of targeted owners based on intervention reports received from field units. The list is updated monthly. The twentieth day of each month serves as the cutoff date for the following months list. Information received after the twentieth of each month is included on the next list after that.

- b. Application. All vessels associated with a targeted

owner receive 5 points under Column I, Block A of the Foreign Vessel Targeting Matrix (See Figure 23-1), not just vessels that were previously detained under the provisions of an international convention.

- c. Removal. A targeted owner is removed from the list if they are associated with less than two detentions carried out under the authority of an international convention within the previous 12 months.
 - d. Release of Information. Although the targeted owners list is intended as an internal working document for use with the targeting matrix, requests for copies of the list are no longer required to be made under the Freedom of Information Act. Units are authorized, as of January 1, 1996, to provide the list to all requestors, provided that a copy of Appendix A to this chapter is completed and attached prior to release.
 - e. Verification of Owners and Operators. During boardings, field units should ensure Marine Safety Information System (MSIS) entries regarding owners and operators are accurate, regardless of whether a boarding results in a vessel being detained. Time charterers, brokerage firms and shipping agents normally do not assume responsibility for ship's maintenance or operations and should not be listed as owners or operators. Intervention reports provided by field units should include the ship's owner as indicated on the ship's registry and the operator as indicated by the ship's Certificate of Financial Responsibility.
 - f. MSIS Entries. Field units should update MSIS within 48 hours of a boarding if MSIS entries differ from that indicated by the ship's papers to ensure accurate targeting.
2. Targeted Flag State. A targeted flag state is a country with an intervention ratio exceeding the average intervention ratio for all flag states with vessels operating in U.S. waters and which has been associated with more than a single detention carried out under the authority of an international convention within the past 12 months.
 - a. Flag State Intervention Ratio. A flag state's intervention ratio is calculated by dividing the number of its vessels detained under the authority of an international convention by the number of vessels under its registry which entered U.S. waters. An average intervention ratio for all flag states with vessels operating in U.S. waters is obtained by

dividing the number of vessels detained under the authority of an international convention by the number of vessels that entered U.S. waters. Ratios are calculated based on the previous three years' data to reduce the effects of any anomalies.

- b. Targeted Flag State List. This list consists of the targeted flag states compiled by G-MCO on an annual basis for use with the foreign vessel targeting matrix.
 - c. Application. All vessels registered with a targeted flag state are assigned 7 points in Column II, Block A of the Foreign Vessel Targeting Matrix (see Figure 23-1), not just vessels that were previously detained under the provisions of an international convention.
 - d. Removal. A targeted flag state is removed from the list when its intervention ratio drops below the average intervention ratio for all flag states with vessels operating in U.S. waters or when it is associated with less than two detentions carried out under the authority of an international convention within the past 12 months.
 - e. Release of Information. The targeted flag state list is intended for publication.
 - f. Verification of Flag State. During boardings, field units should ensure MSIS entries regarding flag states are accurate, regardless of whether a boarding results in a vessel being detained.
 - g. MSIS Entries. Field units should update MSIS within 48 hours of a boarding if MSIS entries differ from that indicated by the ship's papers to ensure accurate targeting.
3. Targeted Classification Society. A targeted classification society is a classification society that has not been recognized by the Coast Guard as demonstrating compliance with the guidelines of the International Maritime Organization (IMO) Resolution A.739(18) (Guidelines for the Authorization of Organizations Acting on Behalf of the Administration), or whose performance is below expectations, based on the number of interventions associated with the classification society. A graduated point system is applied to all classification societies that meet IMO Resolution A.739(18) incorporating statistical box plot methodology.
 - a. Classification Society. A classification society is an organization, other than a flag state, that issues

Certificates of Class and/or International Convention Certificates.

- b. Recognized Classification Societies. The term recognized classification societies includes all classification societies recognized by the Coast Guard as meeting IMO Resolution A.739(18). To comply with this resolution, an organization must demonstrate that they have the following:

- Rules published or available in English;
- Participation of administration in development of rules and regulations;
- Significant technical, managerial, and support staff;
- A written code of ethics;
- Written quality policy;
- An internal audit system such as ISO 9000, and
- Certification of its quality system by independent auditors.

A list of recognized classification societies is distributed to field units along with their ranking as determined by the box plot method for use with the foreign vessel targeting matrix. The list will be updated on an annual basis. The currently recognized classification societies include:

American Bureau of Shipping
Bureau Veritas
China Classification Society
Det Norske Veritas
Germanischer Lloyd
Hellenic Register of Shipping
Korean Register of Shipping
Lloyd's Register of Shipping
Nippon Kaiji Kyokai
Polski Rejestr Statkow
Registro Italiano Navale
Russian Register of Shipping
a.k.a. Maritime Register of Shipping

- c. Targeted Classification Society List. The Targeted Classification Society List contains the names of classification societies that will receive points in the foreign vessel targeting matrix. This list will include all classification societies that do not meet IMO resolution A.739(18) and some of those classification societies that do meet the IMO resolution as described below.

The recognized classification societies are evaluated on their annual performance and separated into three categories with a different assignment of points for

each. They include: 50% of all the intervention ratios around the median value; the top 25% of the classification society intervention ratios; and the bottom 25% of classification society intervention ratios.

- d. Classification Society Intervention Ratios. A classification society's intervention ratio is calculated by dividing the number of vessels classed by the society that were detained under the authority of an international convention as a result of class related deficiencies by the number of vessels classed by the society that entered U.S. waters.
- e. Application. Vessels associated with classification societies that are not recognized as meeting IMO Resolution A.739(18) are assigned 5 points in Column III, Block A of the Foreign Vessel Targeting Matrix (See Figure 23-1). Vessels associated with classification societies that meet IMO Resolution A.739(18) are assigned points in Column III, Block B, C, D and E as follows: top 25% receive 0 points; middle 50% receive 1 point; bottom 25% receive 3 points; and any classification society with an outlying intervention ratio as determined by the statistical box plot method receive 5 points. See Section 3.C. of this chapter for actual matrix instructions.
- f. Release of Information. The recognized classification society and the targeted classification society lists are intended for publication.
- g. Verification of Classification Societies. During boardings field units should ensure MSIS entries regarding classification societies are accurate, regardless of whether a boarding results in a vessel being detained. Intervention reports provided by field units should include the ship's classification society. The classification society is the one that issued the ship's certificate of class. In some cases, other certificates (i.e. the International Convention for Safety of Life at Sea (SOLAS) Safety Construction Certificate, SOLAS Safety Equipment Certificate, SOLAS Passenger Ship Safety Certificate and Load Line Certificate) may be issued by other classification societies or by the flag state. The classification society entered under the Vessel File Involved Party (VFIP) product set of MSIS should be the one that issued the certificate of class. The Vessel File List of Documents (VFLD) product set should be used to document the issuing authority of other documents. Targeting decisions under Column

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III of the foreign vessel targeting matrix are based on the classification society that issued the certificate of class.

- h. MSIS Entries. Field units should update MSIS within 48 hours of a boarding if MSIS entries differ from that indicated by the ship's papers to ensure accurate targeting. Units should enter or update the classification society in the VFIP product set using the following IPN numbers:

Party Name	IPN	Alternate IPN
American Bureau of Shipping	IP94005485	ABS
Biro Klasifikasi Indonesia	IP94014106	KI
British Telecom	IP94014125	BT
Bulgarian Register of Shipping	IP94014102	BR
Bureau Veritas	IP94005481	BV
China Classification Society	IP94005513	CCS
China Corporation Register of Shipping	IP94014111	CR
Croatian Register of Shipping	IP94005525	CRS
Det Norske Veritas	IP94005487	DNV
Germanischer Lloyd	IP94005490	GL
Hellenic Register of Shipping	IP94014103	HR
Horizon International Surveying & Inspection Bureau	IP94014108	HNS
Indian Register of Shipping	IP94005523	IRS
International Register of Shipping (Ex: Belize Surveying Service Inc.)	IP94017987	BSS
Korean Register of Shipping	IP94005518	KRS
Lloyds Register of Shipping	IP93011276	LR
Maritime Register of Shipping & Russian Register of Shipping	IP91016925	RS
Nippon Kaiji Kyokai	IP94005491	NK
Panama Bureau of Shipping	IP94014113	PBS
Polski Rejestr Statkow	IP94005520	PRS

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Registro Italiano Navale	IP93021118	RINA
Romanian Register of Shipping	IP94014092	RRS
Vietnam Register of Shipping	IP94014096	DKVN

To ensure the integrity of the data base, field units should not create new IPNs to enter classification society data. New IPNs will be created by G-MCO as needed, upon request. Requests should be forwarded via Marine Safety Mail Box (MSMB) addressed to G-MCO. [Note: The issuance of an IPN does not mean that the classification society complies with the standards of IMO Resolution A.739(18)].

- C. Matrix Instructions. Upon receipt of an advance notice of a foreign vessel arrival, log into MSIS to check the ship's Port Safety Vessel History (PSVH) and VFIP product sets. The former should provide most of the essential targeting information including owner, operator, flag state, boarding history and type of ship. However, until a change can be made to MSIS, the classification society identified in the VFIP product set may not automatically appear on the PSVH screen. Therefore, the VFIP product set must be checked separately to identify the classification society. Use the Foreign Vessel Targeting Matrix (Figure 23-1) and follow the steps indicated to determine the ship's boarding priority.

1. Column I.

- If the owner, operator or managing operator of a vessel is included on the current Targeted Owners List provided by G-MCO, place an "X" in Block A under Column I and assign 5 points.
- Record the total points in the block at the bottom of the column. A maximum total of 5 points may be assigned.
- Proceed to Column II.

2. Column II.

- Check the ship's flag state against the current Targeted Flag State List. If the flag state is listed as a targeted flag state, place an "X" in Block A under Column II and assign 7 points.
- Record the total points in the block at the bottom of the column. A maximum total of 7 points may be assigned.

c. Proceed to Column III.

3. Column III.

- a. Check the ship's classification society against the list of Recognized Classification Societies in Section 3.b. of this chapter. If the vessel is not classed, the classification society is not recognized, or the class is unknown, place an "X" in Block A under Column III and assign 5 points.
- b. If the ship's classification society is recognized, but the classification society is included on the Targeted Classification Society List, place an "X" in Block B, C or D under Column III which corresponds with the following point allocations respectively. Assign 0 points for the top 25%, 1 point for the middle 50% and 3 points for the classification societies in the bottom 25%.
- c. If the ship's classification society is recognized, but is outside of the box plot, place an "X" in Block E under Column III and assign 5 points.
- d. Record the total points in Blocks A and B of Column III in the block at the bottom of the column. A maximum total of 5 points may be assigned.
- e. Proceed to Column IV.

4. Column IV.

- a. If the PSVH product indicates that the vessel has been the subject of an intervention leading to detention within the past 12 months, place an "X" in Block A under Column IV and assign 5 points for each detention. A Vessel of Particular Interest Notice (PSPI) is entered by G-MCO after reviewing intervention reports received from field units. This notice will assist in identifying vessels detained within the previous 12 months, but may not include very recent detentions. Field units must check the Operational Control section of the PSVH to determine whether any recent interventions have occurred.
- b. If PSVH indicates that the vessel has been the subject of any other form of operational control within the past 12 months (i.e. COTP Order or Customs hold), place an "X" in Block B under Column IV and assign 1 point for each incident. Do not assign multiple points to incidents where more than one control action was taken during a single port call.

- c. If PSVH indicates that the vessel has been involved in any marine casualty or pollution cases (MC cases) within the past 12 months, place an "X" in Block C under Column IV and assign 1 point for each MC case.
 - d. If PSVH indicates that the vessel has been the subject of a marine violation report within the past 12 months, place an "X" in Block D under Column IV and assign 1 point for each MV case.
 - e. If PSVH indicates the vessel has not been boarded in the past 6 months, place an "X" in Block E under Column IV and assign 1 point.
 - f. Total the points in Blocks A, B, C, D and E of Column IV and record in the block at the bottom of the column. The total points in Column IV is unlimited.
 - g. Proceed to Column V.
5. Column V.
- a. If the vessel is an Oil or Chemical Tanker, place an "X" in Block A and assign 1 point.
 - b. If the vessel is a Gas Carrier, place an "X" in Block B and assign 1 point.
 - c. If the vessel is a Bulk Freighter 10 or more years old, place an "X" in Block C and assign 2 points.
 - d. If the vessel is a Passenger Ship, place an "X" in Block D and assign 1 point.
 - e. If the vessel is carrying a low value commodity in bulk, place an "X" in Block E and assign 2 points. Examples of low value commodities include, but are not limited to, scrap metal, tallow, asphalt, sugar, and paper.
 - f. Total the points in Blocks A, B, C, D and E of Column V and record in the block at the bottom of the column. A maximum total of 4 points may be assigned.
 - g. Proceed to Step 6.
6. Total.
- a. Total the points assigned in each column and enter the sum in the block at the lower right corner of the matrix.
 - b. Compare the total with the Foreign Vessel Targeting

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Criteria priority as determined through a review of the description of priority I, II, III, and IV boardings.

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FOREIGN VESSEL TARGETING MATRIX

OWNER Column I	FLAG Column II	CLASS SOCIETY Column III	BOARDING HISTORY Column IV	VSL TYPE Column V
A. Ship owned or operated by a targeted owner	A. Ship flagged by a targeted flag state	A. Not listed as a recognized class or class unknown B. Top 25% recognized C. Middle 50% recognized D. Bottom 50% recognized E. Outside of Box Plot recognized	A. Subject to intervention leading to detention w/in past 12 months and/or B. Subject to other operational control w/in 12 months and/or C. Involved in marine casualty or oil/hazardous materials incident w/in 12 months and/or D. Subject of violation report w/in 12 months E. Not boarded w/in 6 months	A. Oil or Chemical Tanker or B. Gas Carrier or C. Bulk Freighter 10 or more years old or D. Passenger ship or E. Ships carrying low value commodities in bulk
Total of Column I	Total of Column II	Total of Column III	Total of Column IV	Total of Column V
Max 5 Points	Max 7 Points	Max 5 Points	Unlimited Pts	Max 4 Points

Total Points from Columns I through V

Note: Total points from Columns I through V are applied during the identification phase. This is not the only criteria used to prioritize boardings. See Identifying and Scheduling Priority Boardings.

Figure 23-1

- D. Identifying and Scheduling Priority Boardings. The matrix is one part of the process for determining a ship's boarding priority. Using the score on the matrix, as well as other information obtained about the ship, determine the ship's priority designation based on the criteria listed below.

1. Priority I Vessels

a. Priority I vessels include:

1. Stateless vessels;
2. Vessels suspected of involvement in a marine casualty that may have affected the seaworthiness of the ship;
3. Vessels suspected of hazarding the port or environment as a result of a hazardous materials release or an ongoing discharge of oil;
4. Vessels specifically targeted for boarding as Priority I vessels by the Commandant as noted in MSIS;
5. Vessels specifically targeted by the OCMI/COTP for boarding prior to entry based on specific information or other identifiable criteria indicating a high likelihood that a vessel is substandard; and
6. Vessels scoring 17 or more points on the targeting matrix.

- b. Priority I Boarding. Priority I vessels will be scheduled for examination prior to entering a U.S. port. The boarding team will include a qualified marine inspector. When feasible, discrepancies will be corrected prior to entry. Exceptions to at-sea boardings may be made when the Officer in Charge Marine Inspection (OCMI) or Captain of the Port (COTP) determines that the risks to boarding personnel or other logistical considerations make an at-sea boarding impractical. In such cases, the vessel will be targeted for examination, and any discrepancies corrected, prior to the commencement of cargo transfer operations or passenger embarkation. If a vessel is targeted for boarding solely as a result of scoring a total of 17 or more points on the targeting matrix and has been boarded within 6 months, the vessel maybe reduced to Priority III vessel status provided no serious deficiencies were identified during the last boarding.

2. Priority II Vessels.

a. Priority II vessels include:

1. Vessels that do not have, or are past due for, an annual Tank Vessel Examination, Biennial Certificate of Compliance Examination, or Annual Control Verification Examination;
2. Vessels with overdue outstanding requirements issued at previous examinations;
3. Vessels that lack a record of previous Coast Guard examination;
4. Vessels specifically targeted for boarding as Priority II vessels by the Commandant as noted in MSIS;
5. Vessels that have not been examined since being released from a port state intervention carried out by the U.S. or any other party to the applicable convention; and
6. Vessels scoring a total of 7 or more points on the matrix.

- b. Priority II Boarding. Normally, Priority II vessels will be scheduled for examination prior to commencement of cargo operations or passenger embarkation. Examinations may be conducted after port entry, but discrepancies should be corrected prior to commencing cargo transfer operations or embarking passengers. Exemptions may be permitted based on a general examination or other indications that a vessel is in substantial compliance with applicable standards. If a vessel is targeted for boarding solely as a result of scoring 7 or more points on the targeting matrix and has been boarded within 6 months, the vessel may be reduced to Priority III vessel status provided no serious deficiencies were identified during the last boarding.

3. Priority III Vessels.

a. Priority III vessels include:

1. Vessels that do not have, or are past due for, an annual Freight Vessel Examination, or quarterly Passenger Vessel Reexamination;

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2. Vessels alleged to be substandard by a member or members of the ship's crew, a professional or other association, a trade union or any other interested person(s);
 3. Vessels specifically targeted for boarding as Priority III vessels by the Commandant; and
 4. Vessels scoring a total of 4 to 6 points on the matrix.
- b. Priority III Boarding. Priority III vessels may be targeted for examination after entry into port without restrictions on the start of cargo operations or passenger embarkation. Discrepancies should be corrected prior to departure except as permitted by the OCMI/COTP. When exceptions are made, discrepancies must generally be corrected prior to entry into next U.S. port.
4. Priority IV Vessels.
- a. Priority IV vessels include:
 1. Vessels possessing none of the critical criteria discussed under the higher priorities; and
 2. Vessels scoring a total of 0 to 3 points on the matrix.
 - b. Priority IV Boarding. Priority IV vessels will not be targeted for boarding, but may be boarded at the discretion of the OCMI/COTP.
- E. Determining Time and Location of Boarding. Once a priority determination is made, the vessel will be boarded and examined. The following criteria is provided as a guide to determine where and when the boarding will take place. This is not intended to limit the options of the OCMI or COTP or to preclude the use of proper judgement in determining boarding priorities. It is fully recognized that personnel shortages, logistics, weather and other unforeseen events may lead to circumstances which would interfere or prevent boardings from occurring in accordance with this guidance.
1. Quality Over Quantity. Of paramount importance is the quality of vessel boardings and examinations. When faced with limited resources or adverse

conditions that prevent complete examinations on all applicable ships, personnel are expected to conduct thorough examinations on those vessels of highest priority rather than cursory, or incomplete, examinations of all Priority I, II, III or IV ships. The quality of the boarding takes priority over the quantity of vessels examined. This is not to say that every examination must be all encompassing. Rather, it means that each examination should consist of at least a check of the vessel's documents followed by a general walk-around examination of the ship. If no obvious deficiencies or signs of neglect, severe wastage or mismanagement are evident during this examination, the boarding may be terminated. If evidence of problems is observed, the examination must progress into the expanded portion of the exam to the extent necessary to ascertain the scope of the problem and the corrective measures needed.

- a. Records. Records of boarding decisions should be maintained for 24 months to account for missed boarding opportunities should they become the subject of a future review.
2. Boarding at Sea. In the 1994 DOT Appropriations Bill, Congress mandated that the Coast Guard ensure vessels comply with applicable standards prior to entering port rather than prior to their departure. Recognizing the inherent risks to boarding teams, logistical costs, and the increased time commitment needed to conduct at-sea boardings the targeting criteria were designed to strike a balance between at-sea boardings and boardings in port. In part, targeting owners, classification societies and flag states with poor performance records encourages compliance prior to entering U.S. ports. However, in the case of Priority I ships, this encouragement is not enough.
 - a. Priority I Vessel Boardings. Priority I vessels, which include those vessels suspected of presenting an imminent threat to life, the port, or the environment, will be targeted for boarding prior to entry into port. All efforts should be made to board prior to port entry. In general, this means within the 3 mile territorial sea limits, but prior to crossing the headlands or entrance into the port. Cooperation among M, N, and O resources is essential to effectively board Priority I vessels prior to port entry. District M officers, MSOs, COTPs, and MIOs are encouraged to work with District O and Group commands to

facilitate the use of WPBs and small boats as boarding platforms. If a vessel cannot be boarded at-sea due to weather, logistical or other resource constraints, it should be boarded at the earliest opportunity thereafter, whether at the sea buoy, a designated anchorage, or some other point convenient to the boarding process. The onus is upon the OCMI/COTP to notify a vessel when port entry is to be restricted or delayed.

- b. Delays. Delays to the vessel are to be minimized to the extent practicable. This does not mean that a vessel cannot be asked to stop and meet a boarding team at some pre-designated position. Also, it does not preclude short delays necessary to accommodate the safety of the boarding team. However, unless specific information is known about a vessel indicating it presents an imminent threat to life, the port, or the environment, it should not be unduly delayed because of Coast Guard resource or logistical constraints. Suspicion based upon the ship's owner, classification society or flag state alone is insufficient grounds to delay a ship. Specific information could include, but is not limited to: previous boarding experience with the ship, allegations by the ship's crew or other interested parties that the ship is substandard, reported casualties, equipment failures, or evidence of an oil spill or hazardous materials release.
 - c. Reporting of Priority I Non-boards. Priority I non-boards must be reported to the appropriate district commander. In addition, a Vessel File Particular Interest (VFPI) note indicating that the vessel was not boarded must be entered in MSIS by the cognizant COTP or OCMI.
3. Boarding Before Cargo Operations or Passenger Embarkation. Priority II vessels are normally targeted for boarding prior to commencing cargo operations or embarking passengers. The onus is upon the OCMI/COTP to notify a vessel when cargo or passengers operations are to be restricted or delayed.
 - a. Delays. It is not intended that cargo operations or passenger embarkation be unduly delayed. No vessel should be restricted or delayed based solely upon points received as a result of owner, flag state, or classification society association. The OCMI/COTP should not

delay operations pending the arrival of a boarding team unless specific information exists indicating the vessel presents an imminent threat to life, the port, or the environment. Specific information could include but is not limited to: previous boarding experience with the ship, allegations by the ship's crew or other interested parties that the ship is substandard, evidence of a casualty, equipment failures, or evidence of an oil spill or hazardous materials release. Absent specific information, it is the responsibility of the OCMI/COTP to get a boarding team to the vessel prior to the start of these operations. In some cases, the particular hazards created by the ship's condition or the nature of its cargo necessitate the expedited removal of cargo or passengers. The OCMI/COTP must be sensitive to these situations and apply common sense in imposing restrictions.